

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy

§ 87(2)(b)

CT 2: 18 U.S.C. § 554, Smuggling Goods from the United States

The Introduction of this Indictment is hereby incorporated by reference as if fully set forth

Beginning on or about December 26, 2019, and continuing to and including on or about February 12, 2020, in the Western District of Texas, Defendant,

MARISA BEATRIZ MORENO,

and others known and unknown to the grand jury, knowingly and willfully did combine, conspire, confederate and agree with each other and with others known and unknown to the Grand Jury, to commit the following offense against the United States, that is, knowingly and unlawfully conceal, buy, and facilitate the transportation and concealment of any merchandise, article and object, prior to exportation, knowing the same to be intended for exportation from the United States, contrary to any law or regulation of the United States, to-wit: approximately 50,000 rounds of 7.62 x 39mm rifle ammunition, all in violation of Title 18, United States Code, Sections 371 and 554.

OVERT ACTS

1. Defendant on or about February 12, 2020 purchased approximately 8,320 rounds of 7.62 x 39mm rifle ammunition at the direction of another person with the intent to export it from the United States.

2. On February 12, 2020, Defendant made a false declaration to a Customs and Border Protection Officer about the presence of ammunition in the car she was driving that day as she attempted to exit the United States and enter Mexico with the ammunition.

COUNT II
(18 U.S.C. § 554)

That on or about February 12, 2020, in the Western District of Texas and elsewhere, Defendant,

MARISA BEATRIZ MORENO,

knowingly and unlawfully exported and attempted to export from the United States into Mexico, any merchandise, article and object, contrary to any law or regulation of the United States, to wit:

approximately 8,320 rounds of 7.62 x 39mm rifle ammunition, in violation of Title 18, United States Code, Section 554.

A TRUE BILL.


FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY: 
Assistant U.S. Attorney